

November 5, 2010

Mr. Forrest Cole
Forest Supervisor
Tongass National Forest
648 Mission St.
Ketchikan, AK 99901

Subj: Draft Integrated 5-Year Vegetation Plan 2010-2014

Dear Mr. Cole:

The purpose of this letter is to provide comment on the draft Integrated Five-Year Vegetation Plan for the Tongass National Forest as reflected in the materials posted on the Forest Service website (http://www.fs.fed.us/r10/tongass/newsroom/newsroom_specialreports_5YearPlan).

The USFS Transition

Audubon Alaska appreciates the initial steps being taken to expand Tongass Forest management beyond traditional timber sale opportunities and the express commitment of the Forest Service to rapidly transition away from old growth logging. Development of the Transition Framework, announced earlier this year by Regional Forester Pendleton, is a critical first step toward the diversification of forest management priorities that will also provide economic opportunities for rural communities. Implemented carefully and successfully, we believe the transition will benefit both forest health and local community economic opportunity.

We are especially supportive of new projects involving stream rehabilitation, maintenance of fish passage, road storage and other on-the-ground investments in the restoration of forest productivity that will protect and enhance subsistence harvest opportunities. These projects appropriately recognize that the value of the forest includes far more than wood fiber for extraction and will provide economic and other resource opportunities for local communities. Forest Service efforts to initiate stewardship contracting on the Tongass is appropriate and holds great promise as an important means of implementing the transition.

Five Year Plan Conflicts with Priority Conservation Watersheds

While we are encouraged by the innovative elements of the draft Integrated Five-Year Vegetation Plan that reflect a diversity of management activities, including wildlife habitat improvement projects, stream restoration, thinning, road decommissioning, and development of new recreation infrastructure, we also have significant continuing concerns regarding the scope and scale of the conventional timber harvest program called for by the draft Integrated Five-Year Vegetation Plan.

As you are aware, Audubon Alaska and The Nature Conservancy have evaluated the Tongass at the watershed scale to identify areas of greatest ecological importance based on their productivity for all five salmonid species along with a variety of other wildlife values (e.g., habitat quality for deer, bear and marbled murrelet, and riparian and large-tree old-growth habitat). This evaluation provides the basis for identification of specific Conservation Priority Watersheds (CP) throughout the Tongass within each of the forest's biogeographic provinces.

An initial review of the draft Integrated Five-Year Vegetation Plan indicates that there remain a significant number of apparent or real conflicts involving 17 individual Conservation Priority Watersheds that the Forest Service has identified, in part or whole, in the draft plan as designated

for “Forest Management” (FM) or the combined category of “Forest Management/Wildlife Management” (FM/WM).

These Conservation Priority Watersheds are noted below, in association with the respective timber sale NEPA process:

**Conservation Priority Watersheds Designated as FM or FM/WM
within the Draft Integrated Five-Year Vegetation Plan**

NEPA Process/Sale	AA-TNC	Watershed Name	VCU	5-YR
Big Thorne EIS	CP	N Honker Divide	5740	FM
	CP	S Honker Divide	5750	FM
	CP	Center Peak	5760	FM
	CP	Thorne River Falls	5780	FM
	CP	Control Lake/Upper Thorn	5060	FM
Central Kupreanof EIS	CP	Irish lakes	4290	FM
	CP	Upper Castle River	4360	FM
	CP	Duncan Bay	4380	FM
	CP	Towers Arm	4400	FM
Kuiu EIS	CP	Security Bay	4000	FM
Kuiu Stewardship EIS	CP	Security Bay	4000	FM
	CP	Bay of Pillars	4030	FM/WM
Logjam EIS	CP	Sweetwater Lake	5730	FM
Navy EIS	CP	Mosman Inlet	4670	FM
	CP	Burnette Bay	4680	FM
Northwest Kupreanof EIS	CP	Duncan Salt Chuck	4410	FM
Staney IRMP	CP	Nussuk Bay	5910	FM/WM
WRG Island EIS	CP	Thoms lake	4790	FM

CP = AA-TNC Conservation Priority Watershed; FM = Forest Management; FM/WM = Forest Management & Wildlife Management

The Audubon Alaska-TNC conservation assessment indicates that the watersheds noted above have very significant ecological values and we urge that they be exempted from future timber harvest. In some cases, the configuration of a specific sale might be responsive to this concern as in the case of the Kuiu Stewardship EIS project respecting VCUs 4000 and 4030. In other cases, it appears there may be a fundamental conflict – e.g., the CP watersheds identified as proposed for “Forest Management” (harvest) under the Big Thorne EIS, including VCUs 5740, 5750, 5760, 5780, and 5060.

Overlap Between 5-Year Pan and Integrated Management Watersheds

In addition to identifying Conservation Priority Watersheds, the AA-TNC conservation assessment has also identified watersheds in the category of Integrated Management Watersheds. These are watersheds that have been roaded and/or sustained past harvest activity but continue to have exceptional resource values that warrant especially careful management. Review of the draft Integrated Five-Year Vegetation Plan indicate there are approximately fifty Integrated Management Watersheds that overlap with watersheds under the draft Integrated Five-Year Vegetation Plan designated for Forest Management and/or Wildlife Management. See

Attachment A. A prominent example of such a watershed is Kadake Creek (VCU 4210) designated for Forest Management as part of the Kuiu EIS.

A more detailed understanding of the specific plans and silvicultural prescriptions intended for these and other Integrated Management Watersheds is needed before it can be determined whether there are significant conflicts between the draft Integrated Five-Year Vegetation Plan and efforts to manage and conserve the exceptional fishery and wildlife values of these specific watersheds.

Other General Comments

Audubon Alaska is very encouraged by the new direction that the Forest Service has identified for the transition. We share the view expressed by Alaska Regional Forester Beth Pendleton when the Transition Framework was released that "it is possible to provide economic opportunity and jobs to our local residents and to sustain a viable timber industry while at the same time transitioning quickly away from timber harvesting in roadless areas and old-growth forests."

At the same time, we are concerned that the draft Integrated Five-Year Vegetation Plan indicates that the Forest Service continues to advance a conventional timber sale schedule that does not reflect a clear downward trend in old growth logging. As we understand the draft Integrated Five-Year Vegetation Plan the Forest Service would continue to offer sales averaging about of 90 mmbf/year, more than three times the cut levels of recent years.

The maps and spreadsheet provided by the Forest Service are a very important starting point to help understand what is being considered under the transition. To better interpret the draft plan, additional clarity regarding what is specifically intended by the designations of "Wildlife Management" and "Forest Management/Wildlife Management" is needed to determine whether possible conflicts with conservation objectives are just apparent or, in fact, real.

A summary narrative in addition to the maps and spreadsheet would be very helpful to put the overall package of projects and timber sales into context. More precise definitions are needed for these designations. In particular, the term "Wildlife Management" can be widely interpreted to include restoration and/or enhancement activities with quite different implications. A basic question: is "wildlife management" the primary objective of management or a by-product of some forest management/silvicultural treatment? Additional information is also needed concerning the design of specific "wildlife management" actions and the timeframe over which such activities are intended to occur.

Again, we are very supportive of the efforts being made by the Forest Service as it seeks to implement a transition that moves out of old growth, stays out of roadless areas and seeks to provide economic opportunity for local communities. We recognize the fundamental nature of this shift in forest management and that charting this new path presents significant challenges. We greatly appreciate the leadership being provided by this Administration at all levels in the effort to make the Tongass Forest transition meaningful and real.

Sincerely,



Eric F. Myers
Policy Director

cc: Alaska Regional Forester Beth Pendleton

Attachment A**TNF Forest Management and Wildlife Management Watersheds
that Overlap with AA-TNC Integrated Management Watersheds**

NEPA Document	VCU
Baht EIS	4560
Big Thorne EIS	5950
Carroll Inlet YG EA	7460
	7530
Chasina EIS	6790
Couverden EIS	1180
	1190
	1200
Heceta	5610
	5620
Iyouktug EIS	2100
Kennel Creek	2170
Klam EIS	7330
Koz VMP	5430
	5460
Kuiu EIS	3990
	4020
	4210
Kuiu Stewardship EIS	3990
	4020
	4210
Logjam EIS	5770
Neck Lake EA	5340
	5371
	5380
	5390
	5400
	5492
	5500
Ocean Boulevard CE	2450
Old Franks EIS	6210
Overlook EA	4500
Peril EA	2430
Saddle Lakes EIS	7460
	7470
	7530
Sealevel EIS	7460
Shrimp Bay	7330
Spit Point	7530
Staney IRMP	5710
	5770
	5871
	5880

	5890
	5940
Suisse EIS	4560
Thomas Bay EA	4890
Tonka EIS	4470
Tuxekan EA	5560
Upper Harris	6220
Winter Harbor #2	5871